

**IN THE UNITED STATES BANKRUPTCY COURT
FOR THE NORTHERN DISTRICT OF MISSISSIPPI**

IN RE: KATHERINE THOMAS, Debtor

**Case No. 17-10697-SDM
CHAPTER 13**

CERTIFICATE OF SERVICE

I, Thomas C. Rollins, Jr., do hereby certify that a true and correct copy of the Application to Employ, Affidavit and Notice of Hearing were forwarded on November 10, 2022, to:

By Electronic CM/ECF Notice:

Michael W. Boyd, Attorney for Debtor

Case Trustee

U.S. Trustee

/s/ Thomas C. Rollins, Jr.

Thomas C. Rollins, Jr. (MSBN 103469)
Jennifer A Curry Calvillo (MSBN 104367)
The Rollins Law Firm, PLLC
P.O. Box 13767
Jackson, MS 39236
601-500-5533
trollins@therollinsfirm.com

**UNITED STATES BANKRUPTCY COURT
NORTHERN DISTRICT OF MISSISSIPPI**

In Re: Katherine Thomas) Case No.: 17-10697-SDM
Debtor(s)) Chapter: 13
) Judge: Selene D. Maddox

PLEASE TAKE NOTICE that a **TELEPHONIC** hearing will be held

on 12/21/22 at 10:00 AM

Responses Due: 12/5/22

to consider and act upon the following:

78 – Application to Employ Morgan & Morgan as Special Counsel Corrected Filed
by Thomas C. Rollins Jr. on behalf of Morgan & Morgan. (Rollins, Thomas)

This matter **will be held telephonically**. All attorneys, parties and other interested parties appearing should follow the dial in instructions below:

- 1) Complete the dial in instructions below at least 5 minutes prior to the time of the hearing.
- 2) Dial 877-402-9757, and when prompted, enter Access Code 1558104#.
- 3) Once you are connected to the call, identify yourself by stating your name.
- 4) Once your telephonic presence is acknowledged by the courtroom deputy, please mute your phone until further notice from the Court.
- 5) Do not place the call on hold at any time during the call as this may lead to disturbing noises for the other call participants.

Should you experience difficulties connecting to the telephonic hearing, please contact the Clerk's Office at 662-369-2596.

Should any party receiving this notice respond or object to said motion such response or objection is required to be filed with the Clerk of this court and served on the Attorney for Movant on or before said response due date. If any objection or response is filed, an evidentiary hearing will be held on the above mentioned date regarding any facts not stipulated to by the parties. If no objection or response is filed, the Court may consider said motion immediately after the objection or response due date. Please note that a corporation, partnership, trust, or other business entity, other than a sole proprietorship, may appear and act in Bankruptcy Court only through a licensed attorney.

A copy of the motion is required to be served pursuant to Rules 9013 and 9014. THE MOVING PARTY'S ATTORNEY IS REQUIRED BY THE STANDING ORDER TO PERFORM NOTICING AS TO SAID MOTION, THE NOTICE OF HEARING, AND THE OBJECTION DEADLINE, ACCORDING TO THE TERMS OF SAID STANDING ORDER. Please see the Standing Order available at:
http://www.msnb.uscourts.gov/sites/msnb/files/so_notic_revised.pdf

Dated: 11/9/22

Shallanda J. Clay
Clerk, U.S. Bankruptcy Court

BY: MRH
Deputy Clerk

**IN THE UNITED STATES BANKRUPTCY COURT
FOR THE NORTHERN DISTRICT OF MISSISSIPPI**

IN RE: KATHERINE THOMAS, Debtor

**Case No. 17-10697-SDM
CHAPTER 13**

APPLICATION TO BE EMPLOYED AS SPECIAL COUNSEL

COMES NOW, Morgan & Morgan (“Applicant”), by and through undersigned counsel, and pursuant to 11 U.S.C. §327(e) and F.R.B.P. 2014(a), files this Application to be Employed Special Counsel in the above Chapter 13 bankruptcy case and in support hereof would show unto the Court the following, to wit:

1. That Morgan & Morgan represent that in the administration of the above referenced Debtors’ estate, it has been determined necessary to employ Special Counsel to provide assistance with the prosecution of the Debtor’s personal injury claim.
2. That the Applicant desires to be employed to render services in connection with the claim as Special Counsel for the Debtor.
3. That it would be in the best interests of the estate that said firm be employed.
4. An attorney for Morgan & Morgan has attached his affidavit hereto, stating that the firm is a disinterested party to Debtor’s estate. See Exhibit “A”.
5. That in consideration of said representation, Morgan & Morgan will receive a contingency fee and reimbursement of costs, the total of which will not exceed 50% of the total recovery.

WHEREFORE PREMISES CONSIDERED, Applicant prays that the Court enter an Order authorizing the employment of Morgan and Morgan as Special Counsel for the Debtor under the provisions set forth herein and by Order of this Court.

Respectfully submitted,

Morgan & Morgan, APPLICANT

BY:

/s/ Thomas C. Rollins, Jr.

Thomas C. Rollins, Jr. (MSBN 103469)

Jennifer A Curry Calvillo (MSBN 104367)

The Rollins Law Firm, PLLC

P.O. Box 13767

Jackson, MS 39236

601-500-5533

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**IN THE UNITED STATES BANKRUPTCY COURT
FOR THE NORTHERN DISTRICT OF MISSISSIPPI**

IN RE: KATHERINE THOMAS, Debtor

Case No. 17-10697-SDM
CHAPTER 13

AFFIDAVIT OF ATTORNEY

STATE OF MISSISSIPPI

COUNTY OF Hinds

William A. Graves of Morgan and Morgan, being first duly sworn in connection with the application of the Debtor that I be employed as Special Counsel for the above referenced Debtor to perform services in the aforesaid styled and numbered matter, do hereby state:

1. That, to the best of my knowledge, I represent no interest adverse to said Debtor, Trustee or the Estate of the Debtor in the matters upon which I am to be engaged and that I am a disinterested party, except as set out below.
2. That, to the best of my knowledge, I have no connection or affiliation with the Debtor, Trustee, creditors, or other parties in interest herein, their respective attorneys and accountants, the United States Trustee, or any person employed in the Office of the United States Trustee, except as set out below.
3. That said services shall be rendered under a contingent fee agreement.
4. That for the purposes of full disclosure, the following exceptions and notations are made, to-it:
 - a. As Special Counsel for Debtor, I will perform legal services in connection with the prosecution of Debtor's post-petition personal injury claim.

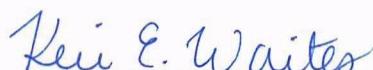
FURTHER, AFFIANT SAITH NOT.

Dated this the 7th day of November, 2022.



William A. Graves

SWORN TO AND SUBSCRIBED BEFORE ME, this the 7th day of
November, 2022.



NOTARY PUBLIC



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4 **UNITED STATES BANKRUPTCY COURT**
5 **NORTHERN DISTRICT OF MISSISSIPPI**

6 IN RE:
7 KATHERINE THOMAS

8 CASE NO: 17-10697
9 **DECLARATION OF MAILING**
10 **CERTIFICATE OF SERVICE**
11 Chapter: 13

12 On 11/10/2022, I did cause a copy of the following documents, described below,
13 Notice of Hearing, Application to Employ and Affidavit

14
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18 to be served for delivery by the United States Postal Service, via First Class United States Mail, postage prepaid, with
19 sufficient postage thereon to the parties listed on the mailing list exhibit, a copy of which is attached hereto and
20 incorporated as if fully set forth herein.

21 I caused these documents to be served by utilizing the services of BK Attorney Services, LLC d/b/a certificateofservice.
22 com, an Approved Bankruptcy Notice Provider authorized by the United States Courts Administrative Office, pursuant to
23 Fed.R.Bankr.P. 9001(9) and 2002(g)(4). A copy of the declaration of service is attached hereto and incorporated as if
fully set forth herein.

24 Parties who are participants in the Courts Electronic Noticing System ("NEF"), if any, were denoted as having been
25 served electronically with the documents described herein per the ECF/PACER system.

26 DATED: 11/10/2022

27 /s/ Thomas C. Rollins, Jr.
28 Thomas C. Rollins, Jr. 103469

The Rollins Law Firm
P.O. Box 13767
Jackson, MS 39236
601 500 5533
jennifer@therollinsfirm.com

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4 **UNITED STATES BANKRUPTCY COURT**
5 **NORTHERN DISTRICT OF MISSISSIPPI**

6 IN RE:
7 KATHERINE THOMAS

8 CASE NO: 17-10697

9
10 **CERTIFICATE OF SERVICE**
11 **DECLARATION OF MAILING**

12 Chapter: 13

13
14 On 11/10/2022, a copy of the following documents, described below,

15
16 Notice of Hearing, Application to Employ and Affidavit

17
18
19 were deposited for delivery by the United States Postal Service, via First Class United States Mail, postage prepaid, with sufficient
20 postage thereon to the parties listed on the mailing list exhibit, a copy of which is attached hereto and incorporated as if fully set forth
herein.

21 The undersigned does hereby declare under penalty of perjury of the laws of the United States that I have served the above
22 referenced document(s) on the mailing list attached hereto in the manner shown and prepared the Declaration of Certificate of
Service and that it is true and correct to the best of my knowledge, information, and belief.

23 DATED: 11/10/2022

24
25 
26 _____
27 Jay S. Jump
28 BK Attorney Services, LLC
d/b/a certificateofservice.com, for
Thomas C. Rollins, Jr.
The Rollins Law Firm
P.O. Box 13767
Jackson, MS 39236

PARTIES DESIGNATED AS "EXCLUDE" WERE NOT SERVED VIA USPS FIRST CLASS MAIL (D)=DUPLICATE ADDRESS
PARTIES WITH A '+' AND DESIGNATED AS "CM/ECF E-SERVICE" RECEIVED ELECTRONIC NOTICE THROUGH THE CM/ECF SYSTEM

CASE INFO

LABEL MATRIX FOR LOCAL NOTICING
05371
CASE 17-10697-SDM
NORTHERN DISTRICT OF MISSISSIPPI
ABERDEEN
THU NOV 10 10-12-13 CST 202

EXCLUDE

~~LOCKE D BARKLEY~~
~~6360 155 NORTH~~
~~SUITE 140~~
~~JACKSON MS 39211-2038~~

MICHAEL W BOYD
BOYD LAW OFFICE PA
PO BOX 1586
GREENVILLE MS 38702-1586

C SPIRE
1018 HIGHLAND COLONY PKWY SUITE 300
RIDGE LAND MS 39157-2068

(P) CAPITAL ONE
PO BOX 30285
SALT LAKE CITY UT 84130-0285

CAPITAL ONE
ATTN GENERAL CORRESPONDENCEBANKRUPTCY
PO BOX 30285
SALT LAKE CITY UT 84130-0285

CARDWORKSCW NEXUS
ATTN BANKRUPTCY
PO BOX 9201
OLD BETHPAGE NY 11804-9001

CHASE RECEIVABLES
1247 BROADWAY
SONOMA CA 95476-7503

CREDIT ONE BANK NA
PO BOX 98873
LAS VEGAS NV 89193-8873

CREDIT PLAN OF GREEN
1701B STRONG AVENUE
GREENWOOD MS 38930

CREDIT PLAN OF GREENWOOD
1701B STRONG AVENUE
GREENWOOD MS 38930

(P) DIRECTV LLC
ATTN BANKRUPTCIES
PO BOX 6550
GREENWOOD VILLAGE CO 80155-6550

FACNAB
480 JAMES ROBERTSON PKWY
NASHVILLE TN 37219-3019

FED LOAN SEVICING
PO BOX 69184
HARRISBURG PA 17106-9184

(P) HEIGHTS FINANCE DBA FIRST HERITAGE
ATTN FH BK
PO BOX 1947
GREENVILLE SC 29602-1947

FIRST TOWER LOAN LLC
PO BOX 320001
FLOWOOD MS 39232-0001

(P) GRAND CANYON UNIVERSITY
ATTN ATTN OFC OF GENERAL COUNSEL
PO BOX 11097
PHOENIX AZ 85061-1097

HAROLD REED II
2006 KILDARE STREET NW
HUNTSVILLE AL 35811-1814

LVNV FUNDING LLC ITS SUCCESSORS AND
ASSIGNS
ASSIGNEE OF FNBM LLC
RESURGENT CAPITAL SERVICES
PO BOX 10587
GREENVILLE SC 29603-0587

LEND UP
237 KEARNEY ST 372
SAN FRANCISCO CA 94108-4502

MERRICK BANK
RESURGENT CAPITAL SERVICES
PO BOX 10368
GREENVILLE SC 29603-0368

MERRICK BANK CORP
PO BOX 9201
OLD BETHPAGE NY 11804-9001

MIDLAND FUNDING LLC
MIDLAND CREDIT MANAGEMENT INC AS
AGENT FOR MIDLAND FUNDING LLC
PO BOX 2011
WARREN MI 48090-2011

MORGAN MORGAN
4450 OLD CANTON RD
STE 200
JACKSON MS 39211-5991

NETWORK COLLECTION S
P O BOX 1725
HATTIESBURG MS 39403-1725

NISSAN
POB 660366
DALLAS TX 75266-0366

NISSAN MOTOR ACCEPTANC
PO BOX 660360
DALLAS TX 75266-0360

PARTIES DESIGNATED AS "EXCLUDE" WERE NOT SERVED VIA USPS FIRST CLASS MAIL (D)=DUPLICATE ADDRESS
PARTIES WITH A '+' AND DESIGNATED AS "CM/ECF E-SERVICE" RECEIVED ELECTRONIC NOTICE THROUGH THE CM/ECF SYSTEM

NISSAN MOTOR ACCEPTANCE
PO BOX 660366
DALLAS TX 75266-0366

PRA RECEIVABLES MANAGEMENT LLC
PO BOX 41021
NORFOLK VA 23541-1021

(P) PORTFOLIO RECOVERY ASSOCIATES LLC
PO BOX 41067
NORFOLK VA 23541-1067

HAROLD L REED III
1201 MEDALLION DRIVE
GREENWOOD MS 38930-2123

(P) REPUBLIC FINANCE LLC
282 TOWER RD
PONCHATOULA LA 70454-8318

EXCLUDE
~~THOMAS C ROLLINS JR~~
~~THE ROLLINS LAW FIRM PLLC~~
~~PO BOX 13767~~
~~JACKSON MS 39236 3767~~

SMITH ROUCHIN ASSOCIATES
SRA
1456 ELLIS AVE
JACKSON MS 39204-2204

SYNCHRONY BANK JC PENNEYS
ATTN BANKRUPTCY
PO BOX 956060
ORLANDO FL 32896-0001

DEBTOR
KATHERINE THOMAS
6949 ROSEBANK MOUNT OLIVE ROAD
LEXINGTON MS 39095-8401

EXCLUDE

~~THOMAS C ROLLINS JR~~
~~THE ROLLINS LAW FIRM PLLC~~
~~OBO MORGAN MORGAN~~
~~PO BOX 13767~~
~~JACKSON MS 39236 3767~~

(P) TOWER LOAN
P O BOX 320001
FLOWOOD MS 39232-0001

TOWER LOAN OF LEXINGTON
PO BOX 32067
FLOWOOD MS 39232

EXCLUDE

~~U S TRUSTEE~~
~~501 EAST COURT STREET SUITE 6430~~
~~JACKCON MS 39201 5022~~

US DEPARTMENT OF EDUCATION
CO FEDLOAN SERVICING
PO BOX 69184
HARRISBURG PA 17106-9184

VERIZON
BY AMERICAN INFOSOURCE LP AS AGENT
4515 N SANTA FE AVE
OKLAHOMA CITY OK 73118-7901

GREGORY J WALSH
THE SUNDMAKER FIRM LLC
1027 NINTH STREET
NEW ORLEANS LA 70115-2357

WORLD OMNI FINANCIAL
6150 OMNI PARK DR
MOBILE AL 36609-5195

WORLD OMNI FINANCIAL CORP
1027 NINTH STREET
NEW ORLEANS LA 70115-2357

WORLD OMNI FINANCIAL CORP ITS SUCCESSOR
AND
ASSIGNS
CO WELTMAN WEINBERG REIS CO LPA
323 W LAKESIDE AVE SUITE 200
CLEVELAND OH 44113-1009